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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAIR DE JESUS LEON-LEMON,

Defendant.

Case No. 2:21-cr-00003-APG-EJY

**STIPULATION TO CONTINUE  
SENTENCING HEARING**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Ivette Amelburu Maningo, counsel for Jair De Jesus Leon-Lemon, that the Sentencing hearing currently scheduled for the 16<sup>th</sup> day of March 2022, be vacated and set to a date and time convenient to this Court, but no later than thirty (30) days, as counsel for Defendant is scheduled to start a State Capital trial on April 11, 2022.

The Stipulation is entered into for the following reasons:

1. The parties need additional time to coordinate a meeting with Defendant, Defendant's counsel, a certified interpreter, and Government counsel for the purposes of a safety valve proffer.

2. The Defendant is incarcerated and does not object to the continuance.

1           3.       The additional time requested herein is not sought for purposes of delay.

2           4.       The parties agree to the continuance.

3           5.       Additionally, denial of this request for continuance could result in a miscarriage  
4 of justice.

5           6.       This is the first stipulation between the parties for the purposes of continuing the  
6 sentencing hearing.

7           DATED this 9<sup>th</sup> day of March 2022.

8                               The Law Offices of  
Ivette Amelburu Maningo

9                               By: /s/ Ivette Amelburu Maningo  
10                              Ivette Amelburu Maningo  
Attorney for Defendant  
11                              JAIR DE JESUS LEON-LEMON

12                              By /s/ Allison Reese  
13                              ALLISON REESE  
Assistant United States Attorney  
14                              Attorneys for Plaintiff  
UNITED STATE OF AMERICA

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3                   UNITED STATES OF AMERICA,

4                                   Plaintiff,

5                                   v.

6                   JAIR DE JESUS LEON-LEMON,

7                                   Defendant.

Case No. 2:21-cr-00003-APG-EJY

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER**

8                                   **FINDINGS OF FACT**

9                   Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
10                  Court finds that:

11                  1.       The parties need additional time to coordinate a meeting with Defendant,  
12                  Defendant's counsel, a certified interpreter, and Government counsel for the purposes of a  
13                  safety valve proffer.

14                  2.       The Defendant is incarcerated and does not object to the continuance.

15                  3.       The parties agree to the continuance.

16                  4.       The additional time requested herein is not sought for purposes of delay, but  
17                  merely to allow the parties to coordinate a meeting related to Defendant's eligibility for a safety  
18                  valve reduction at sentencing

19                  5.       Additionally, denial of this request for continuance could result in a miscarriage  
20                  of justice.

21                                   **CONCLUSIONS OF LAW**

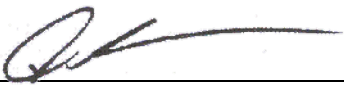
22                  The ends of justice served by granting said continuance outweigh the best interest of the  
23                  public, since the failure to grant said continuance would be likely to result in a miscarriage of  
24                  justice, would deny the parties herein sufficient time and the opportunity within which to be

1 able to effectively and thoroughly prepare for sentencing, taking into account the exercise of  
2 due diligence.

3 **ORDER**

4 IT IS ORDERED that the Sentencing Hearing currently scheduled for the 16<sup>th</sup> day of  
5 March 2022, at the hour of 3:30 p.m., be vacated and continued to April 25, 2022, at the hour  
6 of 1:30 p.m. in Courtroom 6C.

7  
8 DATED: March 11, 2022

  
\_\_\_\_\_  
HONORABLE ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE